

FILED

**Clerk
District Court**

APR 18 2007

**For The Northern Mariana Islands
By _____
(Deputy Clerk)**

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Attorneys for Plaintiff

**IN THE DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS**

QIAN XIAOLI,

Plaintiff,

vs.

GRACE INTERNATIONAL, INC.,

Defendant.

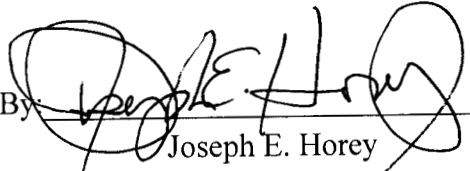
Civ. No. 07-0017

**EX PARTE
MOTION UNDER
LOCAL RULE 7.1.h.3(b)
FOR TEMPORARY
RESTRAINING ORDER**

Plaintiff QIAN XIAOLI hereby moves this Court, pursuant to Rule 65 of the Federal Rules of Civil Procedure, for a temporary restraining order restraining and enjoining Defendant Grace International, Inc., its agents, employees, successors, attorneys, and all persons in active concert and participation with them, from removing assets from the Commonwealth of the Northern Mariana Islands, or otherwise dissipating assets, to the point that less than \$75,000 in assets remains in the CNMI, pending a hearing and determination of plaintiff's Motion For Preliminary Injunction, filed with this court on April 17, 2007. Defendant Grace has closed its Saipan factory, and Plaintiff will suffer immediate and irreparable injury, loss, and damage if Defendant is permitted to remove assets from the CNMI, leaving none or less than \$75,000 remaining, before a hearing can be held on Plaintiff's Motion For Preliminary Injunction, as she will be left without a remedy in the event she prevails on her claim of disability discrimination in this matter. See generally Complaint, Motion For Preliminary Injunction, and Declaration of Qian Xiaoli in support thereof, all filed April 17, 2007.

1 Respectfully submitted this 18th day of April, 2007.

2 O'CONNOR BERMAN DOTTS & BANES
3 Attorneys for Plaintiff

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